

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:22-cv-24066-KMM

GRACE, INC., *et al.*,

*Plaintiffs,*

v.

CITY OF MIAMI,

*Defendant.*

---

**PLAINTIFFS' RULE 26(a)(3) PRETRIAL DISCLOSURES**

Pursuant to FRCP 26(a)(3) and Local Rule 16.1(d), Plaintiffs disclose the following information about the evidence that it may present at trial other than solely for impeachment:

**1. Identification of Witnesses**

**a. Expect to call:**

- i. Miguel De Grandy, Holland & Knight LLP, 701 Brickell Ave Ste 3000,  
Miami, FL 33131, (305) 789-7535
- ii. Dr. Carolyn Abbott, c/o undersigned counsel
- iii. Dr. Bryant Moy, c/o undersigned counsel

**b. May call if the need arises:**

- i. Dr. Cory McCartan, c/o undersigned counsel
- ii. Rebecca Pelham, c/o undersigned counsel
- iii. Rev. Nathaniel Robinson III, c/o undersigned counsel
- iv. Carolyn Donaldson, c/o undersigned counsel
- v. Daniella Pierre, c/o undersigned counsel
- vi. Harold Ford, c/o undersigned counsel

- vii. Clarice Cooper, c/o undersigned counsel
- viii. Jared Johnson, c/o undersigned counsel
- ix. Steven Miro, c/o undersigned counsel
- x. Yanelis Valdes, c/o undersigned counsel
- xi. Alexandra Contreras, c/o undersigned counsel
- xii. Christopher Johnson, GrayRobinson, P.A., 333 SE 2nd Ave Ste 3200,  
Miami, FL 33131, (305) 416-6880
- xiii. Nicholas Warren, c/o undersigned counsel
- xiv. Stephen Cody, 16610 SW 82nd Ct, Palmetto Bay, FL 33157
- xv. Christina White, Miami-Dade County Elections Department, 2700 NW  
87th Ave, Doral, FL 33172, (305) 499-8683
- xvi. Larry Spring, Miami Riverside Center, 444 SW 2nd Ave, Miami, FL, 33130,  
(305) 416-1025
- xvii. Todd Hannon, Office of the City Clerk, 3500 Pan American Dr, Miami, FL  
33133, (305) 250-5360
- xviii. All persons identified or called by Defendant.
- xix. Any other witnesses needed for impeachment or rebuttal.

**2. Deposition Designations:<sup>1</sup>**

- a. Christina White
- b. Larry Spring
- c. Todd Hannon

---

<sup>1</sup> The Parties have agreed to exchange exact designations at a later date.

### 3. Identification of Exhibits

- a. **Expect to offer:** see **Exhibit 1** attached
- b. **May offer if the need arises:**
  - i. All documents Plaintiffs produced through discovery in this case.
  - ii. All documents Defendant produced through discovery in this case.
  - iii. All documents Plaintiffs or Defendant identified in their disclosures in this case.

Respectfully submitted this 29th day of December, 2023.

/s/ Nicholas L.V. Warren

Nicholas L.V. Warren (FBN 1019018)  
**ACLU Foundation of Florida**  
1809 Art Museum Drive, Suite 203  
Jacksonville, FL 32207  
(786) 363-1769  
nwarren@aclufl.org

Daniel B. Tilley (FBN 102882)  
Caroline A. McNamara (FBN 1038312)  
Janine M. Lopez (FBN 1038560)  
**ACLU Foundation of Florida**  
4343 West Flagler Street, Suite 400  
Miami, FL 33134  
(786) 363-2714  
dtalley@aclufl.org  
cmcnamara@aclufl.org

Gregory P. Luib\*  
**Dechert LLP**  
1900 K Street NW  
Washington, DC 20006  
(202) 261-3413  
gregory.luib@dechert.com

Neil A. Steiner\*  
Julia Markham-Cameron\*  
**Dechert LLP**  
Three Bryant Park  
1095 Avenue of the Americas  
New York, NY 10036  
(212) 698-3822  
neil.steiner@dechert.com  
julia.markham-cameron@dechert.com

Christopher J. Merken\*  
**Dechert LLP**  
Cira Centre  
2929 Arch Street  
Philadelphia, PA 19104  
(215) 994-2380  
christopher.merken@dechert.com

*\* Admitted pro hac vice*

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via email on this 29th day of December, 2023, to the following:

Counsel of Record for Defendant.

/s/ Julia Markham-Cameron  
Julia Markham-Cameron\*  
**Dechert LLP**  
Three Bryant Park  
1095 Avenue of the Americas  
New York, NY 10036  
(212) 698-3822  
[julia.markham-  
cameron@dechert.com](mailto:julia.markham-cameron@dechert.com)

\* admitted *pro hac vice*